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December 18, 2023

Via ECF

Hon. Vera M. Scanlon, U.S.D.J.
United States District Court, E.D.N.Y.


Re: Joint Request for Leave to Depose Plaintiff Lanasa Dec. 21, 2023
Case No. 1:22-cv-05686-KAM-VMS — *Justin Lanasa et al. v. Erik Stiene et al.*

Dear Judge Scanlon:

In view of the parties' discovery motions, our October 31, 2023 joint status report was unable to certify the close of all discovery by October 31, 2023 or November 10, 2023, *i.e.*, the deadlines respectively established in Your Honor's April 4, 2023 and July 27, 2023 scheduling orders. Notwithstanding the foregoing, the parties filed a timely status update on October 31, 2023 regarding open discovery disputes. Since that time, the parties have met and conferred in good faith and agreed, to the extent authorized by the Court, to depose Plaintiff Lanasa on December 21, 2023. Accordingly, we hereby request leave to complete that deposition on December 21, 2023.

Respectfully submitted,

FARBER SCHNEIDER FERRARI LLP

By: 
Robert B. Lower

cc: Counsel of record; Hon. Kiyo A. Matsumoto, U.S.M.J. (via ECF)